## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

MOD STACK LI	.C, Plaintiff,	
V.		CASE NO. 2:16-cv-796-JRG-RSP (LEAD CASE) (CONSOLIDATED)
AUDIOCODES, 1	NC., Defendant.	PATENT CASE
CALIX, INC.,	Defendant.	CASE NO. 2:16-cv-797-JRG-RSP (CONSOLIDATED)

## JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT BETWEEN MOD STACK LLC AND CALIX, INC.

Plaintiff, Mod Stack LLC ("Mod Stack") and Defendant Calix, Inc. ("Calix") file this Joint Motion to Stay All Deadlines and Notice of Settlement as between Mod Stack and Calix and respectfully move this Court to stay all unreached deadlines and stay the entry of a Docket Control Order for 30 days as between Mod Stack and Calix.

All matters in controversy between Mod Stack and Calix have been settled, in principle, and the parties respectfully request that the Court stay all unreached deadlines and stay the entry of a Docket Control Order for 30 days so that appropriate dismissal papers may be submitted.

Mod Stack and Calix agree to this joint motion.

Respectfully Submitted

Dated: November 3, 2016 /s/ David R. Bennett

> David R. Bennett (Illinois Bar No. 6244214)

(Admitted to the U.S.D.C. for the E.D. Texas)

DIRECTION IP LAW

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Counsel for Plaintiff Mod Stack LLC

## **CERTIFICATE OF CONFERENCE**

I certify that I communicated with counsel for Calix, Inc. by email. Calix agrees to this Joint Motion.

/s/ David R. Bennett
David R. Bennett

## **CERTIFICATE OF SERVICE**

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served on this November 3, 2016 with a copy of this email via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ David R. Bennett
David R. Bennett